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October 3, 2019

FOIA CONFIDENTIAL TREATMENT REQUESTED

BY FEDEX AND E-MAIL

Daphna A. Waxman, Esq.
Morgan Ward Doran, Esq.
c/o ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E., Mailstop 5973
Washington, DC 20549-5973

RE: Telegram Group Inc. (MNY-9820)

Dear Ms. Waxman and Mr. Doran:

On behalf of Telegram Group Inc. (“Telegram”), we write to inform you that Telegram has sent the below update to all purchasers in the TON Private Placement, which includes information regarding certain technical aspects of the TON Platform and anticipated timing with respect to the launch of the TON Platform. The update, which was sent by email on October 2, 2019, reads as follows:

Dear [Purchaser],

We are happy to share with you that following a successful initial testing period, the Telegram Open Network (“TON”) is planned to be launched in late October.

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The entire source code of TON is available at <https://github.com/ton-blockchain/ton>

In order to initiate the process of issuing Grams in accordance with the Purchase Agreement, we kindly ask you to follow the steps below:

- 1. Install the TON Key Generator software located at <https://generator.ton.org> on a secure computer that is not publicly accessible. Please note that this software is available for Mac OS, Windows and Linux operating systems.*
- 2. Using the TON Key Generator, create a public and a private TON encryption key to be able to access and manage your Grams post-launch.*
- 3. Write down the 24 words which represent your TON private encryption key required to access your Grams. Store these 24 words securely in a place accessible only to you. Important: If you lose these words you will irrevocably lose access to your Grams. If you share these words with third parties, they will have the ability to access your Grams on their own.*
- 4. Send us the 48-symbol public encryption key you generated in Step 2, to shyam@telegram.org by replying to this e-mail.*
- 5. We will then contact you using the contact e-mail and phone number included in the Purchase Agreement and ask you to reconfirm the 48-symbol public encryption key to us.*

Please note that because you participated in the Private Placement, you are eligible to take part in the validators' election process. If you are planning to use your Grams for validation, please follow the technical instruction attached to this e-mail.

Please be advised that due to regulatory considerations neither Telegram nor the TON Foundation will buy Grams or serve as validators post-launch.

We are looking forward to hearing from you. To make sure you are issued Grams in a secure way, please e-mail us your TON public key before October 16, 2019. As a reminder, if you do not provide

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us with a public key to which we should send your Grams by twenty-four (24) months following the date that the TON Blockchain launches, you will forfeit your Grams.

In addition, we hereby enclose a copy the technical instructions for validation referenced in the above update. This letter, the accompanying document, and any copies thereof (collectively, the “Confidential Materials”), are highly confidential, remain the property of Telegram, and are being voluntarily provided to you in connection with the Commission’s inquiries. In the event that any of the Confidential Materials are determined to be “agency records” within the meaning of the Freedom of Information Act, 5 U.S.C. § 552, as amended (“FOIA”), we request confidential treatment for such materials pursuant to FOIA and the applicable rules of the Commission thereunder, including but not limited to Rule 83 of the Commission’s Rules on Information and Requests, 17 C.F.R. § 200.83. In this regard, please be advised that we have submitted to the Commission a request for confidential treatment under FOIA of the Confidential Materials and the letter seeking confidential treatment. A copy of that letter is enclosed herewith.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

/s/ Alexander C. Drylewski

Alexander C. Drylewski

Encl.